

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NAVIENT SOLUTIONS, LLC

Plaintiff,

v.

DAVID MIZE, *et al.*,

Defendants.

CIVIL ACTION No.1:19-cv-00461

**PLAINTIFF NAVIENT SOLUTIONS, LLC'S
EMERGENCY MOTION TO QUASH AND FOR A PROTECTIVE ORDER
PRECLUDING THE DEPOSITION OF PATRICK CHAING**

Pursuant to Rule 26(b)(2)(C) of the Federal Rules of Civil Procedure, Plaintiff Navient Solutions, LLC (“NSL”), by and through counsel, respectfully moves this Court on an emergency basis to (i) quash the subpoena issued by Defendants The Law Offices of Jeffrey Lohman, Jeffrey Lohman, and Jeremy Branch (together, the “Lohman Defendants”), commanding NSL’s former attorney, Patrick Chaing, to appear for deposition on **June 19, 2020**; and (ii) enter an order that precludes the Defendants from deposing him or any other attorney that has represented NSL in this case absent a showing that non-privileged information crucial to their case cannot be obtained from other sources.

* * *

DATED: June 12, 2020

Respectfully submitted,

/s/ Jeffrey R. Hamlin

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2020, I served the foregoing motion by electronic mail on the following:

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